

Inspection Report

Site: Clara Barton Elementary School
5 Blue Lake Road
Levittown, Pa 19057

Inspection date: February 22, 2007

Inspector: Stephen Forostiak

This inspection is being performed based on a tip that asbestos floor tile was removed by untrained employees. I arrived at the Clara Barton Elementary School ("Clara Barton") at approximately 9:35 A.M. I displayed my credential and introduced myself to Kathy Karasakal, the School Principal. I explained the purpose of my visit and suggested she contact the person which the school district designated to handle asbestos issues. Mrs. Karasakal said he, Mr. White, is already on the site. Mrs. Karasakal paged him. Mr. James White, Operations Safety Environmental Training Coordinator with the Bristol Township School District introduced himself and I displayed my credentials and asked that we find a conference area to sit down and discuss the purpose of my visit. I issued the Notice of Inspection EPA form #7740-3 to Mr. White. I asked about the tiles removed. Mr. White said yes, one of his workers removed floor tile. Mr. White said that the work in the rooms was initially meant only to pick up loose floor tile, however the worker removed the rest of the tile. I told Mr. White that I would like to see the rooms where the removal took place and the management plan for the school. Mr. White said that the management plan maybe in the library and that he would check. I asked to see the rooms, Mr. White escorted to the room 8, room 9 and room 11. Each room contained tile fragments around the perimeter. I asked who preformed the removal and where was the waste taken. Mr. White said he did not know but, he contacted the facilities office to request Mr. James N. Anders Jr., Manger of Maintenance Custodial Services for the School District to come to the school. Mr. White said that Mr. Anders will have that information. I informed Mr. White that I needed my supplies from my car. After retrieving my sampling supplies I collected six (6) samples, two (2) from each room. I counted the ceiling tiles, which were 2 feet by 4 feet, to determine each room's size. The size for each room is 29 feet by 32 feet. The square footage of each room is 928 square feet for a total of 2,784 square feet. Mr. Anders arrived on site. I asked who preformed the removal and he said Alex Dewsnap. I asked to have Mr. Dewsnap come to the school so I can speak to him.

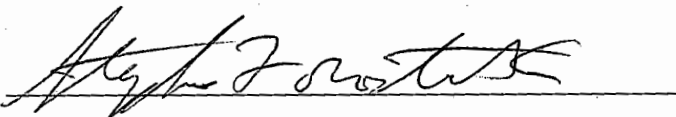
Mr. Dewsnap arrived at the school. At some point after this Mr. White left us to search for the school's management plan. I asked Mr. Dewsnap questions concerning the removal. Essentially Mr. Dewsnap worked Monday 2/14, Tuesday 2/20 and Wednesday night 2/21 along with two (2) others, Mike Malor and Tom Bonfig. A chipping machine was used. Mr. Dewsnap said all the 9x9 tiles were loose or easily loosen and the chipping machine was used on newer 12x12 floor tile. I asked if he had ever received training and he reply no. I also asked if he used water and Mr. Dewsnap said no. It was stated by Mr. Dewsnap and Mr. Anders that since so much of the tile was taken up a decision was made to finish the removal in the rooms. I asked Mr. Anders who gave the actual order to complete the removal of the tile. Mr. Anders replied "I

did". I asked both of these gentlemen where was the debris from this removal. Mr. Dewsnap said it was place in the school's dumpster. I asked if any tile was still on site. Mr. Dewsnap said that the dumpsters are emptied on Mondays and Wednesdays.

I asked for the company responsible for the waste collection. Mr. Anders said Waste Management. Mr. Anders provided me with a telephone for Waste Management. Upon contacting this company I was told to contact a Nick at 1-800-743-3338 extension 3007. I asked Nick where waste collected from Clara Barton was taken. He said the waste goes to Wheelabrator Falls, Inc. in Morrisville, PA and is deposited and incinerated that day. The dumpsters, for Clara Barton, are collected Monday Wednesday and Friday and taken that day to the incinerator plant. At this point I told Alex I was finish questioning him.

Mr. White had eventual left the building to search for the management plan at the facility office. Once Mr. White returned with the AHERA management plan we sat in a conference room across from the main office. I reviewed the management plan, see AHERA Compliance Inspection for the school. Once I finish reviewing the management plan, I informed Mr. White and Mr. Anders that floor tile sampled in the initial inspection and was determined to be asbestos containing. During my closing conference Mr. White, Mr. Anders, & Mrs. Karasakal were present. Mrs. Karasakal asked about exposure, what she should tell parents. I said I did not have any way to knowing what exposure if any, but not to allow access to the rooms until testing and clean up are performed. I also said it would probably be best for parents to consult a physician. She asked what if personal items are still in the classroom. I said if it is absolutely necessary I did not have any issue if Mr. White allowed a maintenance person in the rooms to wipe down any specific items requested by teachers or students. I recommended the school bring in an abatement company to wipe down each room. I also recommended air testing performed before and after wiping down the rooms and that these samples be analyzed by transmission electron microscopy. I suggested that the samples be collected in halls as soon as possible. Mr. White said that he has already contacted an environmental company for collect air tests. I asked to have the air testes fax to my office. I informed Mrs. Karasakal if parents or teachers want to question me she may provide my phone number to them. Mrs. Karasakal left the room.

I asked if there were any questions by any of them. I was asked what will become of this. I said it appears that NESHAP violations may have occurred, however at this time I can not determine how much RACM was created by the floor tile removal, but from the management plan review there are possible AHERA violations. I added that there were possible Model Accreditation Plan ("MAP") violations because each worker lacked asbestos training. I informed them that AHERA violation can be a maximum of \$6,500 per school and from this point on any money spent for purposes of AHERA compliance can be deducted dollar per dollar to reduce the penalty to zero. Even asbestos removal can be considered. When there were no more questions I left the site.



Stephen Forostiak- Compliance Officer

3-1-07

Date

Inspection Report

Site: Clara Barton Elementary School
5 Blue Lake Road
Levittown, Pa 19057

Inspection date: February 26, 2007

Inspector: Stephen Forostiak

Prior to the February 26, 2007 inspection some time during Friday February 23, 2007 I was contacted by Mr. White who stated that the air tests I suggested were faxed to my office. Mr. White said he had got two crews wipe down all three rooms and they even were able to install new tile for each room. I responded was this your employees and he said yes. I responded that I expected you to use an asbestos abatement contractor to complete the wipe down. Mr. White replied I misunderstood you.

On February 26, 2007, at approximately 1:10 P.M., I arrived at the Clara Barton Elementary School. I displayed my credentials to Principal Karasakal, who was in the main office. I explained to Mrs. Karasakal that I would like to ask some follow up questions concerning the floor tile removal incident that occurred last week. Mrs. Karasakal said that she would not answer question pertaining to that incident, but she said the Bristol Township School District's Public Relation person can be available for questions. I said this person would not be able to answer my questions and asked if a Brenda, of the school's janitorial staff, is available to show me the rooms and also answer questions. Mrs. Karasakal stated Brenda is not on site at the moment, but her shift starts at 3:00 P.M. Mrs. Karasakal said she would contact Cindy McGee who is the only one on site right now. I said yes. I also asked who the teachers are for each room. Mrs. Karasakal responded Room 8 is Mrs. Murk, Room 9 is Mrs. Rankin, and Room 11 is Ms. Vile. I informed that I would like to speak to them also and Mrs. Karasakal said they may be on lunch break. I told her that they may contact me concerning any questions they have. Mrs. Cindy McGee arrived and introduced herself and then escorted me to the rooms. While going to the rooms Mrs. McGee stated that the tile removed from the rooms was taken out of the school's dumpster piece by piece and placed in bags. Mrs. McGee said that this material was not supposed to be placed in the school's dumpster so it was removed. I asked where was it taken to, but she did not know. We arrived at Room 8 and I observed new white floor tile. Mrs. McGee said the tile that was removed was not original to the building. Mrs. McGee said the only tile that was asbestos was the ones originally used when the school as first built and most of that is long gone. Mrs. McGee commented that certain colors black and I think red and some other color were the original tile to the building.. I told her that the tan tile pieces I saw are most likely the identical tile mentioned in the management plan for the school and that indicated the beige tile contained 3% asbestos. We entered Room 9 and Mrs. Rankin was present. I displayed my credentials and asked Mrs. Rankin if she remembered the color of the tile and the amount. Mrs. Rankin began to speak when Mrs. McGee interrupted with the original tiles were the ones that were asbestos and repeated the colors before I stopped her and requested she allow Mrs. Rankin to speak. Mrs. Rankin could not recall the weather the tile was nine by nine or twelve by twelve.

I asked if there was patch work of tiles and again Mrs. McGee interrupted. I told Mrs. McGee that I am asking Mrs. Rankin the questions not you. I would like Mrs. Rankin to answer my questions. Mrs. McGee walked away saying it's not like we're criminals here. Mrs. Rankin said there were tiles that were completely loose while others crackled under one's foot. I asked if she could give a number or a percentage of this for her room. Mrs. Rankin estimated about a third of the room was like this. I walked to Room 11, but the room was dark and I could not find Mrs. McGee. I walked back to Room 8 and met Mrs. Murk. I displayed my credentials to her and asked her similar questions. Mrs. Murk said about 8 tiles were completely loose. I had provided each teacher with my business card and said they may call me with any question concerning this incident or to provide my information to any parent with concerns. When I left Room 8 an announcement requesting Mrs. Murk, Mrs. Rankin, and Ms. Vile to come to the office was made. At this time Ms. Vile came out of a room ahead of us and said what, are we in trouble. I replied yes for talking to me. She said who are you and I replied an EPA inspector. When we got to the main office Mrs. Eileen Kelliher, Bristol Township School District's Public Relations, introduced herself. Soon after James White entered and I noticed Mrs. McGee on the phone in the main office. I told Mr. James I would like to see the school's dumpster. While we walked to the dumpster I informed them, Mrs. Kelliher and Mr. White, that Friday 2/23/2007 I was informed that the material was removed from the dumpster and taken elsewhere. Mr. White said he only new what I new that the material was placed in the school's dumpster. We arrived at the dumpster and I noticed bits and pieces of floor tile debris on the ground next to the dumpster. I collected pictures and samples. I asked Mr. White if there was somewhere at the facility office the waste could have been taken. Mr. White was unsure. I asked to go to the facility office. Mrs. Kelliher left us at this time. Once we arrived at the facility office I noticed a 30 yard dumpster in between the buildings. In the dumpster I observed broken tile that had been placed in boxes. I collected pictures and samples. I asked if Alex Dewsnap was in the facility office and if I could see the type of machine used for the tile removal. Eventually Mr. White said Mr. Dewsnap was out on the road but if I wanted him he could be available. I said no, but I asked for Mr. Dewsnap's office phone number. Mr. White also said the machine was still at the Clara Barton Elementary School. Prior to leaving I recommended an abatement contractor come to remove the tile from the dumpster and then I reiterated it with an accent on asbestos contractor. He said he would have Delaware Valley Remediation come back to take care of it. I told him air samples will not be necessary.


Stephen Forostiak- Compliance Officer

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Date